

PAM BASSEL STANDING CHAPTER 13 TRUSTEE

Bar No.01344800
7001 Blvd 26, Ste 150
North Richland Hills, TX 76180
(817)-916-4710

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE:

CASE NO.: 17-43890-ELM-13

ANGEL REE SANSOM

AKA: ANGEL RUSK; ANGEL RUSK-SANSOM
2315 WESTBROOK DR
CARROLLTON, TX 75007
SSN/TIN: XXX-XX-7205

DEBTOR

PRE-HEARING CONFERENCE: July 19, 2019 at 8:30 AM

**TRUSTEE'S MOTION TO DISMISS FOR FAILURE TO COOPERATE
FOR FAILURE TO PROVIDE TAX RETURN, EXTENSION OR AFFIDAVIT**

NOW COMES Pam Bassel, Standing Chapter 13 Trustee, and files this Motion to Dismiss pursuant to 11 U.S.C. §§ 521 and 1307. The Trustee would respectfully show the Court as follows:

1. Debtor filed a Voluntary Petition and has a duty to cooperate with the Chapter 13 Trustee appointed in this case under §521(f).
2. On February 06, 2019 the Trustee mailed the Debtor a 2018 Tax Year Reminder Notice which requested the Debtor's 2018 Tax Return (with Schedules 1, C, E, or F if filed), Amended Tax Return, Tax Extension, or a Tax Affidavit explaining that Debtor was not required to file a Tax Return.
3. To date, Debtor has not provided the requested documents. Therefore, the Trustee requests that the Court dismiss this case based on Debtor's failure to cooperate.

WHEREFORE, Trustee prays that this case be DISMISSED and for general relief.

Respectfully submitted,

By: /s/ Ethan S. Cartwright
Ethan S. Cartwright, Staff Attorney
Bar No. 24068273
PAM BASSEL STANDING CHAPTER 13 TRUSTEE
Bar No. 01344800
7001 Blvd 26, Ste 150
North Richland Hills, TX 76180
(817) 916-4710 Phone
(817) 916-4770 Fax

NOTICE OF HEARING

You are hereby notified of the filing of the foregoing Trustee's Motion to Dismiss for Failure to Cooperate. A pre-hearing conference on the Motion will be held on 7/19/2019 at 8:30 AM at 7001 Blvd 26, Suite 150, North Richland Hills, TX 76180. Any objection not resolved or defaulted at the pre-hearing conference will be heard by the Court at 8:30 AM on 8/1/2019 at 501 W 10th Street, 204, Fort Worth, Texas. You do not have to attend the pre -hearing conference or court hearing unless you oppose the Motion.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served on or before the date of filing. Service was accomplished electronically on Debtor's attorney and all parties entitled to electronic notice and by first class mail on the Debtor and the parties listed below, if any.

By: /s/ Ethan S. Cartwright
Ethan S. Cartwright